

All SIP Paths Require

- To claim SIP credit for a measure, it must be:
 - Quantifiable*
 - Surplus
 - Federally Enforceable**
 - Permanent
- EE/RE measures are often emerging and/or voluntary measures
- Challenging to show that EE/RE measures are surplus in areas subject to a cap and trade program. Possible ways: (1) retire emission allowances or (2) precise modeling

•EPA policies allow flexibility in meeting this requirement for *emerging measures* that do not have the same high level of certainty as traditional measures for quantification purposes

** EPA policies allow flexibility in meeting this requirement for *voluntary measures* which are not directly enforceable against an individual source